

preference. As the Commission notes, one of the benefits of billed party preference would be to standardize dialing requirements. If aggregators and payphone providers are permitted to employ technologies to defeat billed party preference, callers would have no way of knowing which carrier would receive their call if they dialed on a 0+ basis.

Moreover, without a rule change, it is also possible that premises owners at lucrative locations which have not already done so would replace LEC pay telephones with those of Customer Owned Coin Operated Telephone ("COCOT") providers which are presubscribed to a single interexchange carrier in order to preserve their commission income. Both the NYNEX Telephone Companies and the customer would be injured by such a result. First, after spending millions of dollars to implement billed party preference, the NTCs would find that the capital investment made to implement the plan had been spent to provide billed party preference to an ever decreasing public telephone station base. The costs associated with this investment would be borne by the ratepayer. Furthermore, customers would be injured in that many would never receive billed party preference at payphone or aggregator locations.

Finally, all of the billed party preference options would require a lengthy implementation period.

As noted above, in order to implement billed party preference, the NTCs would be required to re-route all 0+ interLATA calls to the NTCs' TOPS to access LIDB. This would

require large numbers of trunk rearrangements,⁵³ as well as two new TOPS switches to accommodate the increased traffic. Furthermore, software upgrades to the NTCs' existing TOPS switches would be necessary to support billed party preference.

The NTCs estimate that the trunk rearrangements would take approximately 51,000 man-hours to complete. Furthermore, the installation of a new TOPS switch is a time consuming process. Based on the time necessary to complete the last TOPS switch installation in New York, the NTCs estimate that approximately sixteen months would be required to complete all the work necessary to install a new TOPS switch, including preliminary engineering, competitive bidding and contract negotiation, and manufacturing and installation by the switch manufacturer.

Other significant impediments to speedy implementation of billed party preference are the two software upgrades to the NTCs' TOPS switches which would be required to implement billed party preference. The TOPS switch manufacturers have indicated that these two software upgrades will not be generally available until some time during the first six months of 1995. Assuming the software modifications are available as scheduled, and provide the necessary functionality, installation and testing in the NTCs' TOPS switches would still require several

⁵³ As noted above, the NTCs estimated that more than 43,000 trunk rearrangements, would be required to implement billed party preference for all 0+ and 0- interLATA traffic.

months. Furthermore, since installation for NYT would be performed by the manufacturer, installation could take even longer because the manufacturer would also have to schedule installation of the same software upgrades in other LECs' TOPS switches.

Finally, billed party preference could not be fully implemented until Operator Services SS7 is available in all the NTCs' end offices. The NTCs have not yet received from the manufacturer general availability dates for this SS7 feature. Until that information is available, it is not possible to provide estimated dates for full billed party preference implementation.⁵⁴

VI. CONCLUSION

While billed party preference would provide significant public benefits, the cost of implementing any of the four billed party preference options suggested by the Commission is substantial. If the Commission nonetheless


⁵⁴ If the NTCs were required to implement billed party preference prior to full deployment of Operator Services SS7, the NTCs would be required to modify the MF signaling between the end offices and TOPS switches to differentiate between 10XXX and "0" dialed calls. These modifications would become obsolete with the implementation of Operator Services SS7.

concludes that billed party preference is in the public interest, it should recognize that billed party preference would simply not be viable as a new service. The NTCs recommend that the substantial implementation and recurring costs for the service be recovered through an increase in the EUCL, rather than as a new service under price caps.

Respectfully submitted,

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Dated: July 7, 1992

**BILLED PARTY PREFERENCE
SUMMARY OF TOTAL INITIAL IMPLEMENTATION AND ANNUAL OPERATING EXPENSES**

	<u>ALL INTERLATA 0+ 0-</u>	<u>ALL INTERLATA 0+</u>	<u>INTERLATA 0+ PUBLIC</u>	<u>INTERLATA 0+ PAYPHONE</u>
L1 INVESTMENTS	\$48,683,423	\$44,135,993	\$39,807,172	\$38,326,914
L2 ONE TIME EXPENSES				
A. BALLOT ALL ACCOUNTS	\$33,946,618	\$33,458,789	\$32,999,487	\$32,861,736
B. BALLOT ALL CALLING CARDS	\$22,726,392	\$22,238,563	\$21,779,261	\$21,641,510
C. BILL INSERTS	\$16,717,835	\$16,230,006	\$15,770,704	\$15,632,953
L3 TOTAL INITIAL IMPLEMENTATION COSTS (L1 PLUS L2)				
A. BALLOT ALL ACCOUNTS	\$82,630,041	\$77,594,782	\$72,806,659	\$71,188,650
B. BALLOT ALL CALLING CARDS	\$71,409,815	\$66,374,556	\$61,586,433	\$59,968,424
C. BILL INSERTS	\$65,401,258	\$60,365,999	\$55,577,876	\$53,959,867
L4 ANNUAL OPERATOR EXPENSES	\$13,710,167	\$6,580,880	\$3,975,948	\$3,838,847

<u>ONE TIME EXPENSES</u>		<u>ALL INTERLATA 0+ 0-</u>	<u>ALL INTERLATA 0+</u>	<u>INTERLATA 0+ PUBLIC</u>	<u>INTERLATA 0+ PAYPHONE</u>
L1	TOPS SWITCH UPGRADES	\$11,400,000	\$11,400,000	\$11,400,000	\$11,400,000
L2	SERVICE ORDER SYSTEM MODIFICATION	\$500,000	\$500,000	\$500,000	\$500,000
L3	BALLOTING				
	A. ALL ACCOUNTS	\$17,889,098	\$17,889,098	\$17,889,098	\$17,889,098
	B. ALL CALLING CARDS	\$7,500,000	\$7,500,000	\$7,500,000	\$7,500,000
	C. BILL INSERTS	\$660,315	\$660,315	\$660,315	\$660,315
L4	BALLOT ADMINISTRATION				
	A. ALL ACCOUNTS	\$1,431,128	\$1,431,128	\$1,431,128	\$1,431,128
	B. ALL CALLING CARDS	\$600,000	\$600,000	\$600,000	\$600,000
	C. BILL INSERTS	\$1,431,128	\$1,431,128	\$1,431,128	\$1,431,128
L5	TRUNK REARRANGEMENTS	\$2,237,622	\$1,951,206	\$1,561,860	\$1,428,722
L6	LIDB SOFTWARE UPGRADE	\$102,857	\$102,857	\$102,857	\$102,857
L7	OPERATOR TRAINING	\$385,913	\$184,500	\$114,544	\$109,931
L8	TOTAL EXPENSES (SUM OF L1 THROUGH L7)				
	A. BALLOT ALL ACCOUNTS	\$33,946,618	\$33,458,789	\$32,999,487	\$32,861,736
	B. BALLOT ALL CALLING CARDS	\$22,726,392	\$22,238,563	\$21,779,261	\$21,641,510
	C. BILL INSERTS	\$16,717,835	\$16,230,006	\$15,770,704	\$15,632,953

BILLED PARTY PREFERENCE COST STUDY
1992 VIEW

ATTACHMENT B
PAGE 2 OF 2

<u>CAPITAL INVESTMENTS</u>		<u>ALL INTERLATA 0+ 0-</u>	<u>ALL INTERLATA 0+</u>	<u>INTERLATA 0+ PUBLIC</u>	<u>INTERLATA 0+ PAYPHONE</u>
L1	NEW TOPS OPERATOR OFFICES BUILDING RENOVATIONS	\$1,840,000	\$920,000	\$920,000	\$920,000
L2	OPERATOR POSITIONS	\$552,000	\$276,000	\$276,000	\$276,000
L3	COMMUNICATION CONSOLE FOR OPERATOR POSITION	\$276,000	\$138,000	\$138,000	\$138,000
L4	TWO ADDITIONAL TOPS SWITCHES	\$18,600,000	\$18,600,000	\$18,600,000	\$18,600,000
L5	LIDB COMPUTER HARDWARE	\$2,400,000	\$2,400,000	\$2,400,000	\$2,400,000
L6	TRUNK TERMINATIONS	\$10,840,230	\$9,462,808	\$7,590,375	\$6,950,069
L7	FACILITY	\$14,175,193	\$12,339,185	\$9,882,797	\$9,042,825
L8	TOTAL INVESTMENTS (SUM OF L1 THROUGH L7)	\$48,683,423	\$44,135,993	\$39,807,172	\$38,326,914
L9	TOTAL ONE-TIME EXPENSES AND CAPITAL INVESTMENTS (SUM OF PG 1, L8 AND PG 2, L8)				
	A. BALLOT ALL ACCOUNTS	\$82,630,041	\$77,594,782	\$72,806,659	\$71,188,650
	B. BALLOT ALL CALLING CARDS	\$71,409,815	\$66,374,556	\$61,586,433	\$59,968,424
	C. BILL INSERTS	\$65,401,258	\$60,385,999	\$55,577,876	\$53,959,867

BILLED PARTY PREFERENCE COST STUDY
ANNUAL OPERATOR EXPENSES - 1992 VIEW

ATTACHMENT C

<u>OPERATOR RELATED EXPENSES</u>		<u>ALL INTERLATA 0-0</u>	<u>ALL INTERLATA 0-0</u>	<u>INTERLATA 0-PUBLIC</u>	<u>INTERLATA 0-PAYPHONE</u>
L1	ADDITIONAL OPERATORS REQUIRED	502	240	149	143
L2	OPERATOR SERVICES BUDGET IMPACT 1992	\$13,710,167	\$6,580,880	\$3,975,948	\$3,538,847

BILLED PARTY PREFERENCE COST STUDY
COSTS INCLUDING OVERHEADS - 1992 VIEW

ATTACHMENT D
PAGE 1 OF 2

<u>INVESTMENT RELATED COSTS</u>		<u>ALL INTERLATA 0+ 0-</u>	<u>ALL INTERLATA 0+</u>	<u>INTERLATA 0+ PUBLIC</u>	<u>INTERLATA 0+ PAYPHONE</u>
L1	NEW TOPS OPERATOR OFFICES BUILDING RENOVATIONS (INVESTMENT * .436831 TOTAL CCF)	\$803,769	\$401,885	\$401,885	\$401,885
L2	OPERATOR POSITIONS (INVESTMENT * .436831 TOTAL CCF)	\$241,131	\$120,565	\$120,565	\$120,565
L3	COMMUNICATION CONSOLE FOR OPERATOR POSITION (INVESTMENT * .436831 TOTAL CCF)	\$120,565	\$60,283	\$60,283	\$60,283
L4	TWO ADDITIONAL TOPS SWITCHES (INVESTMENT * .436831 TOTAL CCF)	\$8,125,057	\$8,125,057	\$8,125,057	\$8,125,057
L5	LIDB COMPUTER HARDWARE (INVESTMENT * .480330 TOTAL CCF)	\$1,152,792	\$1,152,792	\$1,152,792	\$1,152,792
L6	TRUNK TERMINATIONS (INVESTMENT * .436831 TOTAL CCF)	\$4,735,349	\$4,133,648	\$3,315,711	\$3,036,014
L7	FACILITY (INVESTMENT * .436831 TOTAL CCF)	\$6,192,164	\$5,390,139	\$4,317,112	\$3,950,186
L8	TOTAL ANNUAL INVESTMENT RELATED COSTS (SUM OF L1 THROUGH L7)	\$21,370,826	\$19,384,368	\$17,493,404	\$16,846,782

ATTACHMENT B, PAGE 2 AMOUNTS MULTIPLIED BY TOTAL CARRYING CHARGE FACTORS (INCLUDING OVERHEADS), TO SHOW HOW MUCH WOULD BE RECOVERED ON AN ANNUAL BASIS THROUGH RATES.

BILLED PARTY PREFERENCE COST STUDY
DIRECT COSTS - 1992 VIEW

ATTACHMENT D
PAGE 2 OF 2

<u>INVESTMENT RELATED COSTS</u>		<u>ALL INTERLATA 0+ 0-</u>	<u>ALL INTERLATA 0+</u>	<u>INTERLATA 0+ PUBLIC</u>	<u>INTERLATA 0+ PAYPHONE</u>
L1	NEW TOPS OPERATOR OFFICES BUILDING RENOVATIONS (INVESTMENT * DIRECT CARRYING CHARGE FACTOR .26031)	\$478,970	\$239,485	\$239,485	\$239,485
L2	OPERATOR POSITIONS (INVESTMENT * DIRECT CARRYING CHARGE FACTOR .26031)	\$143,691	\$71,846	\$71,846	\$71,846
L3	COMMUNICATION CONSOLE FOR OPERATOR POSITION (INVESTMENT * DIRECT CARRYING CHARGE FACTOR .26031)	\$71,846	\$35,923	\$35,923	\$35,923
L4	TWO ADDITIONAL TOPS SWITCHES (INVESTMENT * DIRECT CARRYING CHARGE FACTOR .26031)	\$4,841,766	\$4,841,766	\$4,841,766	\$4,841,766
L5	LIDB COMPUTER HARDWARE (INVESTMENT * DIRECT CARRYING CHARGE FACTOR .274282)	\$658,277	\$658,277	\$658,277	\$658,277
L6	TRUNK TERMINATIONS (INVESTMENT * DIRECT CARRYING CHARGE FACTOR .26031)	\$2,821,820	\$2,463,264	\$1,975,851	\$1,809,178
L7	FACILITY (INVESTMENT * DIRECT CARRYING CHARGE FACTOR .207831)	\$2,946,045	\$2,584,465	\$2,053,952	\$1,879,379
L8	TOTAL ANNUAL INVESTMENT RELATED COSTS (SUM OF L1 THROUGH L7)	\$11,962,415	\$10,875,025	\$9,877,098	\$9,535,853

ATTACHMENT B, PAGE 2 AMOUNTS MULTIPLIED BY DIRECT CARRYING CHARGE FACTORS (WITHOUT OVERHEADS), FOR EUCL IMPACT

BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+ PAYPHONE
COST PER CALL

L1	<u>ONE TIME EXPENSES</u>		<u>COST PER CALL</u> <u>(THREE YEAR RECOVERY)</u>
		<u>TOTAL</u>	
	A. BALLOT ALL ACCOUNTS	\$32.9M	\$0.0679
	B. BALLOT CALLING CARDS	\$21.6M	\$0.0447
	C. BILL INSERTS	\$15.6M	\$0.0323

	<u>ANNUAL COSTS INCLUDING OVERHEAD</u>		<u>COST</u>
		<u>TOTAL</u>	<u>PER CALL</u>
L2	INVESTMENT RELATED	\$16.9M	\$0.0890
L3	OPERATOR	\$ 3.8M	\$0.0203

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

	<u>A. BALLOT ALL ACCOUNTS</u>	<u>COST</u>
		<u>PER CALL</u>
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0679
L5	ANNUAL INVESTMENT RELATED	\$0.0890
L6	ANNUAL OPERATOR	<u>\$0.0203</u>
L7	TOTAL	\$0.1772

	<u>B. BALLOT ALL CALLING CARDS</u>	<u>COST</u>
		<u>PER CALL</u>
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0447
L9	ANNUAL INVESTMENT RELATED	\$0.0890
L10	ANNUAL OPERATOR	<u>\$0.0203</u>
L11	TOTAL	\$0.1540

	<u>C. BILL INSERTS</u>	<u>COST</u>
		<u>PER CALL</u>
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0323
L13	ANNUAL INVESTMENT RELATED	\$0.0890
L14	ANNUAL OPERATOR	<u>\$0.0203</u>
L15	TOTAL	\$0.1416

BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+ PUBLIC
COST PER CALL

L1	<u>ONE TIME EXPENSES</u>	<u>TOTAL</u>	<u>COST PER CALL</u>
			<u>(THREE YEAR RECOVERY)</u>
	A. BALLOT ALL ACCOUNTS	\$33.0M	\$0.0623
	B. BALLOT CALLING CARDS	\$21.8M	\$0.0411
	C. BILL INSERTS	\$15.8M	\$0.0298
	<u>ANNUAL COSTS INCLUDING OVERHEAD</u>		<u>COST</u>
		<u>TOTAL</u>	<u>PER CALL</u>
L2	INVESTMENT RELATED	\$17.5M	\$0.0845
L3	OPERATOR	\$4.0M	\$0.0192

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

	<u>A. BALLOT ALL ACCOUNTS</u>	<u>COST</u>
		<u>PER CALL</u>
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0623
L5	ANNUAL INVESTMENT RELATED	\$0.0845
L6	ANNUAL OPERATOR	\$0.0192
L7	TOTAL	\$0.1660
	<u>B. BALLOT ALL CALLING CARDS</u>	<u>COST</u>
		<u>PER CALL</u>
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0411
L9	ANNUAL INVESTMENT RELATED	\$0.0845
L10	ANNUAL OPERATOR	\$0.0192
L11	TOTAL	\$0.1448
	<u>C. BILL INSERTS</u>	<u>COST</u>
		<u>PER CALL</u>
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0298
L13	ANNUAL INVESTMENT RELATED	\$0.0845
L14	ANNUAL OPERATOR	\$0.0192
L15	TOTAL	\$0.1335

BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+
COST PER CALL

L1	<u>ONE TIME EXPENSES</u>	<u>TOTAL</u>	<u>COST PER CALL</u> <u>(THREE YEAR RECOVERY)</u>
	A. BALLOT ALL ACCOUNTS	\$33.5M	\$0.0507
	B. BALLOT CALLING CARDS	\$22.2M	\$0.0337
	C. BILL INSERTS	\$16.2M	\$0.0246

	<u>ANNUAL COSTS INCLUDING OVERHEAD</u>	<u>TOTAL</u>	<u>COST PER CALL</u>
L2	INVESTMENT RELATED	\$19.4M	\$0.0751
L3	OPERATOR	\$ 6.6M	\$0.0255

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

	<u>A. BALLOT ALL ACCOUNTS</u>	<u>COST PER CALL</u>
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0507
L5	ANNUAL INVESTMENT RELATED	\$0.0751
L6	ANNUAL OPERATOR	<u>\$0.0255</u>
L7	TOTAL	\$0.1513

	<u>B. BALLOT ALL CALLING CARDS</u>	<u>COST PER CALL</u>
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0337
L9	ANNUAL INVESTMENT RELATED	\$0.0751
L10	ANNUAL OPERATOR	<u>\$0.0255</u>
L11	TOTAL	\$0.1343

	<u>C. BILL INSERTS</u>	<u>COST PER CALL</u>
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0246
L13	ANNUAL INVESTMENT RELATED	\$0.0751
L14	ANNUAL OPERATOR	<u>\$0.0255</u>
L15	TOTAL	\$0.1252

BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+, 0-
COST PER CALL

L1	<u>ONE TIME EXPENSES</u>		COST PER CALL <u>(THREE YEAR RECOVERY)</u>
		<u>TOTAL</u>	
	A. BALLOT ALL ACCOUNTS	\$33.9M	\$0.0449
	B. BALLOT CALLING CARDS	\$22.7M	\$0.0301
	C. BILL INSERTS	\$16.7M	\$0.0221
	<u>ANNUAL COSTS INCLUDING OVERHEAD</u>		
		<u>TOTAL</u>	COST <u>PER CALL</u>
L2	INVESTMENT RELATED	\$21.4M	\$0.0723
L3	OPERATOR	\$13.7M	\$0.0464

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

	<u>A. BALLOT ALL ACCOUNTS</u>	COST <u>PER CALL</u>
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0449
L5	ANNUAL INVESTMENT RELATED	\$0.0723
L6	ANNUAL OPERATOR	<u>\$0.0464</u>
L7	TOTAL	\$0.1636

	<u>B. BALLOT ALL CALLING CARDS</u>	COST <u>PER CALL</u>
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0301
L9	ANNUAL INVESTMENT RELATED	\$0.0723
L10	ANNUAL OPERATOR	<u>\$0.0464</u>
L11	TOTAL	\$0.1488

	<u>C. BILL INSERTS</u>	COST <u>PER CALL</u>
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0221
L13	ANNUAL INVESTMENT RELATED	\$0.0723
L14	ANNUAL OPERATOR	<u>\$0.0464</u>
L15	TOTAL	\$0.1408

BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+ PAYPHONE
MONTHLY COST PER EUCL

L1	<u>ONE TIME EXPENSES</u>		MONTHLY COST PER EUCL (THREE YEAR RECOVERY)
		<u>TOTAL</u>	
	A. BALLOT ALL ACCOUNTS	\$32.9M	\$0.0730
	B. BALLOT CALLING CARDS	\$21.6M	\$0.0481
	C. BILL INSERTS	\$15.6M	\$0.0347

	<u>ANNUAL DIRECT COSTS</u>		MONTHLY COST PER EUCL
		<u>TOTAL</u>	
L2	INVESTMENT RELATED	\$ 9.5M	\$0.0541
L3	OPERATOR	\$ 3.8M	\$0.0218

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

	<u>A. BALLOT ALL ACCOUNTS</u>	MONTHLY COST PER EUCL
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0730
L5	ANNUAL INVESTMENT RELATED	\$0.0541
L6	ANNUAL OPERATOR	<u>\$0.0218</u>
L7	TOTAL	\$0.1489

	<u>B. BALLOT ALL CALLING CARDS</u>	MONTHLY COST PER EUCL
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0481
L9	ANNUAL INVESTMENT RELATED	\$0.0541
L10	ANNUAL OPERATOR	<u>\$0.0218</u>
L11	TOTAL	\$0.1240

	<u>C. BILL INSERTS</u>	MONTHLY COST PER EUCL
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0347
L13	ANNUAL INVESTMENT RELATED	\$0.0541
L14	ANNUAL OPERATOR	<u>\$0.0218</u>
L15	TOTAL	\$0.1106

BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+ PUBLIC
MONTHLY COST PER EUCL

L1	<u>ONE TIME EXPENSES</u>	<u>TOTAL</u>	<u>MONTHLY COST PER EUCL (THREE YEAR RECOVERY)</u>
	A. BALLOT ALL ACCOUNTS	\$33.0M	\$0.0733
	B. BALLOT CALLING CARDS	\$21.8M	\$0.0484
	C. BILL INSERTS	\$15.8M	\$0.0350

	<u>ANNUAL DIRECT COSTS</u>	<u>TOTAL</u>	<u>MONTHLY COST PER EUCL</u>
L2	INVESTMENT RELATED	\$ 9.9M	\$0.0561
L3	OPERATOR	\$ 4.0M	\$0.0226

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

	<u>A. BALLOT ALL ACCOUNTS</u>	<u>MONTHLY COST PER EUCL</u>
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0733
L5	ANNUAL INVESTMENT RELATED	\$0.0561
L6	ANNUAL OPERATOR	\$0.0226
L7	TOTAL	\$0.1520

	<u>B. BALLOT ALL CALLING CARDS</u>	<u>MONTHLY COST PER EUCL</u>
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0484
L9	ANNUAL INVESTMENT RELATED	\$0.0561
L10	ANNUAL OPERATOR	\$0.0226
L11	TOTAL	\$0.1271

	<u>C. BILL INSERTS</u>	<u>MONTHLY COST PER EUCL</u>
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0350
L13	ANNUAL INVESTMENT RELATED	\$0.0561
L14	ANNUAL OPERATOR	\$0.0226
L15	TOTAL	\$0.1137

**BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+
MONTHLY COST PER EUCL**

L1	<u>ONE TIME EXPENSES</u>		<u>MONTHLY COST PER EUCL</u> <u>(THREE YEAR RECOVERY)</u>
		<u>TOTAL</u>	
	A. BALLOT ALL ACCOUNTS	\$33.5M	\$0.0743
	B. BALLOT CALLING CARDS	\$22.2M	\$0.0494
	C. BILL INSERTS	\$16.2M	\$0.0360

L2	<u>ANNUAL DIRECT COSTS</u>		<u>MONTHLY COST</u> <u>PER EUCL</u>
		<u>TOTAL</u>	
L2	INVESTMENT RELATED	\$10.9M	\$0.0617
L3	OPERATOR	\$ 6.6M	\$0.0374

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

L4	<u>A. BALLOT ALL ACCOUNTS</u>	<u>MONTHLY COST</u> <u>PER EUCL</u>
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0743
L5	ANNUAL INVESTMENT RELATED	\$0.0617
L6	ANNUAL OPERATOR	<u>\$0.0374</u>
L7	TOTAL	\$0.1734

L8	<u>B. BALLOT ALL CALLING CARDS</u>	<u>MONTHLY COST</u> <u>PER EUCL</u>
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0494
L9	ANNUAL INVESTMENT RELATED	\$0.0617
L10	ANNUAL OPERATOR	<u>\$0.0374</u>
L11	TOTAL	\$0.1485

L12	<u>C. BILL INSERTS</u>	<u>MONTHLY COST</u> <u>PER EUCL</u>
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0360
L13	ANNUAL INVESTMENT RELATED	\$0.0617
L14	ANNUAL OPERATOR	<u>\$0.0374</u>
L15	TOTAL	\$0.1351

BILLED PARTY PREFERENCE
COST SUMMARY ALL INTERLATA 0+, 0-
MONTHLY COST PER EUCL

L1	<u>ONE TIME EXPENSES</u>	<u>TOTAL</u>	<u>MONTHLY COST PER EUCL</u> <u>(THREE YEAR RECOVERY)</u>
	A. BALLOT ALL ACCOUNTS	\$33.9M	\$0.0754
	B. BALLOT CALLING CARDS	\$22.7M	\$0.0505
	C. BILL INSERTS	\$16.7M	\$0.0371

	<u>ANNUAL DIRECT COSTS</u>	<u>TOTAL</u>	<u>MONTHLY COST</u> <u>PER EUCL</u>
L2	INVESTMENT RELATED	\$12.0M	\$0.0679
L3	OPERATOR	\$13.7M	\$0.0778

TOTAL COSTS (ONE TIME EXPENSES OVER THREE YEARS, OPERATOR EXPENSES, INVESTMENT RELATED EXPENSES)

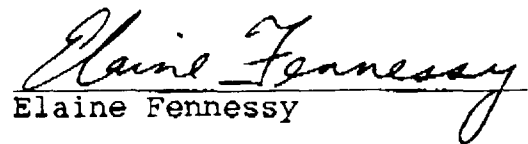
	<u>A. BALLOT ALL ACCOUNTS</u>	<u>MONTHLY COST</u> <u>PER EUCL</u>
L4	ONE TIME EXPENSES OVER THREE YEARS	\$0.0754
L5	ANNUAL INVESTMENT RELATED	\$0.0679
L6	ANNUAL OPERATOR	\$0.0778
L7	TOTAL	\$0.2211

	<u>B. BALLOT ALL CALLING CARDS</u>	<u>MONTHLY COST</u> <u>PER EUCL</u>
L8	ONE TIME EXPENSES OVER THREE YEARS	\$0.0505
L9	ANNUAL INVESTMENT RELATED	\$0.0679
L10	ANNUAL OPERATOR	\$0.0778
L11	TOTAL	\$0.1962

	<u>C. BILL INSERTS</u>	<u>MONTHLY COST</u> <u>PER EUCL</u>
L12	ONE TIME EXPENSES OVER THREE YEARS	\$0.0371
L13	ANNUAL INVESTMENT RELATED	\$0.0679
L14	ANNUAL OPERATOR	\$0.0778
L15	TOTAL	\$0.1828

CERTIFICATE OF SERVICE

I certify that copies of the foregoing COMMENTS OF THE
NYNEX TELEPHONE COMPANIES were served on each of the parties
listed on the attached Service List, this 7th day of July,
1992, by first class United States mail, postage prepaid.


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